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INSTRUCTIONS: FILL IN THE NAMES IN THE BOX NUMBER BELOW, THE INDEX NUMBER AND THE DATE THE INDEX NUMBER WAS PURCHASED. COMPLETE ALL BLANKS IN ACCORDANCE WITH THE DIRECTIONS SET FORTH IN BOLD PRINT.

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF QUEENS

RECEIVED

MAY 18 2017

COUNTY CLERK
QUEENS COUNTY

JOHANNÉ ROMAIN
[YOUR NAME(S)]

Plaintiff(s),

Index No. 5239 / 2017

-against-
ADELPHI UNIVERSITY COL. NURSING
MARGARET C. ROLLER, MARILYN KLEINBERG
[NAME OF PERSON(S) SUED]

Date Index No.
purchased 5-18-17

SUMMONS

JOANN VICTOR-FASSMAN, DR. ANDREA MCCORMICK
Defendant(s) PATRICIA FACQUET
PATRICK D. COORAN

To the Person(s) Named as Defendant(s) Above:

PLEASE TAKE NOTICE THAT YOU ARE HEREBY SUMMONED to answer the complaint of the plaintiff(s) herein and to serve a copy of your answer on the plaintiff(s) at the address indicated below within 20 days after the service of this Summons (not counting the day of service itself), or within 30 days after service is complete if the Summons is not delivered personally to you within the State of New York.

YOU ARE HEREBY NOTIFIED THAT should you fail to answer, a judgment will be entered against you by default for the relief demanded in the complaint.

Dated: 5-17, 2017
[DATE OF SUMMONS]

JOHANNÉ ROMAIN
[YOUR NAME(S)]

176 RUSHMORE ST
WESTBURY NY 11590-3821
516-943-4239
[YOUR ADDRESS(ES) and
PHONE NUMBER(S)]

Defendant's Address ADELPHI UNIVERSITY GARDEN CITY NY 11530
[ADDRESS OF PERSON(S) SUED]

Venue: Plaintiff(s) designate(s) Queens County as the place of trial. The basis of this designation is [CHECK ONE]:

- ☐ Plaintiff(s)' Residence in Queens County.
☐ Defendant(s)' Residence in Queens County.
☒ Other -- Describe: BETTER OPPORTUNITY TO HAVE MY VOICE HEARD

NOTE: THIS FORM OF SUMMONS MUST BE SERVED WITH A COMPLAINT

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF QUEENS

Reset Form

-----X
JOHANNE ROMAIN

Plaintiff,

Index No. 5239/2017

- against -

ADELPHI UNIVERSITY COLLEGE of NURSING
MAUREEN C. ROLLER, MARILYN KLAINBERG
JOAN VICTOR-FASSMAN, DR. ANDREA MCCORMICK
PATRICIA FACQUET, PATRICK D. COONAN
Defendant.
-----X

COMPLAINT

TO THE SUPREME COURT OF THE STATE OF NEW YORK

The complaint of the plaintiff, JOHANNE ROMAIN, respectfully
shows and alleges as follows:

1. ADELPHI UNIVERSITY DID NOT SERVE MY BEST INTERESTS.
2. ADELPHI UNIVERSITY DID NOT ACCOMMODATE ME and COMMITTED A BREACH OF CONTRACT AS PERTAINING TO DISABILITY DISCRIMINATION.
3. UNDER THE LAWS of the United States (see 29 U.S.C. § 701 et. seq. and 42 U.S.C. § 12101) and THE HUMAN RIGHTS LAWS of THE STATE of NY (15 N.Y. Exec. § 296), IT IS WRONGFUL FOR A PUBLIC INSTITUTION TO DISCRIMINATE SOLELY BY REASON OF HIS OR HER DISABILITY, BE EXCLUDED FROM THE PARTICIPATION IN, BE DENIED THE BENEFITS OF, OR BE SUBJECTED TO DISCRIMINATION UNDER ANY COVERED PROGRAM OR ACTIVITY.
3. I FEEL STRONGLY THAT ADELPHI UNIVERSITY AND THE NAMED DEFENDANTS VIOLATED TITLE II OF THE

AMERICANS WITH DISABILITY ACT AND SECTION 504 OF THE REHABILITATION ACT.

4. ADELPHI TOOK AWAY FROM ME THE DREAM OF BECOMING A NURSE AND TAKE CARE OF FAMILIES AS I HAD ENVISIONED.

5. ADELPHI UNIVERSITY WAS FULLY AWARE OF MY PSYCHOLOGICAL DISORDER, NAMELY BIPOLAR DISORDER AND USED THAT TO HURT MY EDUCATIONAL ENDEAVORS.

6. ADELPHI UNIVERSITY WRONGFULLY DISMISSED ME.

7. ADELPHI UNIVERSITY MADE CLAIMS TO HIDE BEHIND THEIR ACTIONS AND THESE WILL BE EXPANDED UPON IN COURT.

8. ADELPHI UNIVERSITY HAS CAUSED ME EMOTIONAL AND FINANCIAL HARM.

9. I ASK THE COURT TO COMPENSATE ME FOR THE DAMAGES AND LOSSES I HAVE SUSTAINED AS A RESULT AND STILL CONTINUE TO ENDURE.

Dated: 5-17-17

JOHANNE ROMAIN
Plaintiff

VERIFICATION

JOHANNE ROMAIN, being duly sworn, deposes and says:

I am the plaintiff in the above-entitled action. I have read the foregoing complaint and know the contents thereof. The same are true to my knowledge, except as to matters therein stated to be alleged on information and belief and as to those matters I believe them to be true.

Johanne Romain
Signature

JOHANNE ROMAIN
Print Name

Sworn to before me this
17 day of MAY 2017

Ivonne Ladouceur
Notary Public

IVONNE A LADOUCEUR 5
NOTARY PUBLIC-STATE OF NEW YORK
NO. 01LA6326489
QUALIFIED IN NASSAU COUNTY
MY COMMISSION EXPIRES 06-15-2019